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The Honorable Jerrold N. Poslusny, U.S.B.J.  
United States Bankruptcy, District of New Jersey  
U.S. Post Office and Courthouse  
401 Market Street  
Camden, NJ 08101

**RE: In re Sandra May  
Case No.: 19-27812-JNP  
Our File No.: 12434  
Limited Objection to Motion to Approve Sale  
Hearing Date: September 1, 2021**

Dear Judge Poslusny:

This firm represents secured creditor, McCormick 105, LLC (“McCormick”) in the above referenced matter. We are in receipt of the Debtor’s Motion to Approve Private Sale of Real Estate [Doc 110] and hereby submit this limited objection thereto.

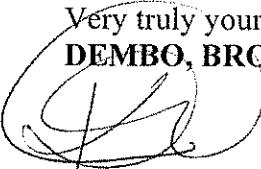
The Debtor proposes the sale of the real property located at: 590 Livezy Street, Philadelphia, Pennsylvania 19128 (the “Property”). As set forth in Claim 4, McCormick is the holder of a Mortgage that encumbers said Property. No objection has been filed to McCormick’s Claim and therefore it is presumptively valid. See 11 U.S.C. §502 and Fed.R.Bankr.Pro. 3001(f).

While McCormick supports the sale of the Property for purposes of paying the Debtor’s creditors, it does so only to the extent that McCormick is paid in full at closing in an amount sufficient to satisfy all sums due and owing under the Loan Documents. Until such time as

McCormick is paid in full, it objects to the release, discharge and/or satisfaction of its valid and undisputed Mortgage. Upon entry of an Order approving the sale, Debtor's counsel should contact the undersigned for a payoff as of the closing date and same will be provided.

For the reasons set forth above, McCormick submits this limited objection to the Debtor's Motion. We thank the Court for its time and courtesy in this regard.

Very truly yours,  
**DEMBO, BROWN & BURNS LLP**

  
Kyle F. Eingorn

cc: Eric J. Clayman, Esquire (via CM/ECF)  
Isabel Balboa, Esquire (via CM/ECF)  
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